

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW HAMPSHIRE

IN RE:

BRIAN J. GOODMAN, SR.,

Debtor.

Case No. 25-10233-KB

Chapter 13

**CREDITOR'S MOTION TO EXTEND TIME TO RESPOND TO DEBTOR'S
MOTION TO STRIKE PROOF OF CLAIM NO. 11 AND DEBTOR'S REFINED
OBJECTION TO PROOF OF CLAIM NO. 11**

Wilmington Savings Fund Society FBS, not in its individual capacity but solely as Owner Trustee of CIM Trust 2025-NR-1, by Fay Servicing, LLC, ("Creditor") hereby moves to extend the response deadlines to the Debtor's motion to strike Creditor's proof of claim #11 [ECF#127] and Debtor's objections to the same [ECFs #128 and 129]. This is Creditor's first request for an extension. The motion, objection, and adversary complaint [25-01028, ECF#130] appear to have been filed *pro se* by the Debtor himself, but he continues to be represented by counsel. Undersigned counsel has requested an extension from Debtor's counsel. Debtor's counsel indicated that she was not representing the Debtor in the adversary proceeding or with the motions referred to herein and that she took no position on the request. Debtor's counsel also indicated that she would relay the request for an extension to the Debtor. As of filing, undersigned has not received a response from the Debtor on the request for an extension. As grounds for the extension, Creditor states the following:

On November 26, 2025, Debtor filed both the motion to strike and objection to claim noted above. On the same day, he filed an adversary proceeding against Creditor, consisting of a complaint seeking the same relief and asserting largely the same facts and theories as those in the motion and objection. All of these filings were done *pro se* and were not signed by Debtor's counsel.

Creditor intends to respond to the adversary proceeding in a timely manner and due to the identical nature of the claims presented in the motion, objection, and complaint, requests that this Court extend the response deadlines to the motion and objection from December 10 to December 29, 2025.

This request is intended to promote judicial economy. An extension would allow Creditor to present its legal argument and responses in fewer pleadings, and would permit the Court to schedule hearings more uniformly. An extension does not prejudice the Debtor as he has sought the same relief using a motion, an objection, and a complaint. Creditor's request simply asks that the Court adopt the timeline for a response provided by the adversary complaint for all three rather than three separate deadlines. This request is also made before the expiration of the response deadlines for the motion and objection.

Respectfully submitted,

WILMINGTON SAVINGS FUND SOCIETY,
FSB, not in its individual capacity but solely as
Owner Trustee of CIM TRUST 2025-NR1;
FAY SERVICING, LLC
By: Their Attorneys

/s/ Donald W. Seeley, Jr.

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Dated: December 10, 2025

CERTIFICATE OF SERVICE

I, Donald W. Seeley, Jr., hereby certify that the documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF)

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and paper copies will be sent to those indicated as non-registered participants on December 10, 2025,

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